

## Josh Bernstein, P.C.

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### Civil Rights & Employment Law

Josh Bernstein, P.C.  
175 Varick Street  
New York, NY 10014

(Phone) (646) 308-1515  
(Fax) (718) 679-9517  
jbernstein@jbernsteinpc.com

**Susan J. Baldwin v. Goddard Riverside Community Center**  
**Case No. 11 Civ 7591**

June 17, 2014

The Honorable Paul G. Gardephe  
United States District Court, SDNY  
40 Foley Square, Room 2204  
New York, NY 10007

J. Gardephe,

I represent Plaintiff Susan J. Baldwin in the above-captioned matter, and write to inform your Honor that Defendant's Motion for Summary Judgment has now been fully submitted for over fourteen months. Plaintiff previously submitted a letter to your Honor on April 15, 2014, expressing that Defendant's motion had been fully submitted for an entire calendar year. Accordingly, Plaintiff respectfully requests that your Honor issue a decision on Defendant's motion. Thank you.

Very truly yours,

/s/  
Joshua Alexander Bernstein

Cc: Michael Tiliakos, Esq., *Counsel for Defendant* (via ecf)